

EXHIBIT A

RAYMOND NARDO, Esq.
Counsel for Defendants
129 Third Street
Mineola, NY 11501
(516) 248-2121

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VALENTINA VELEVA, *on behalf of herself*
and all other similarly situated, :

Plaintiff, : **20-CV-1363 (ER)**

-against- :

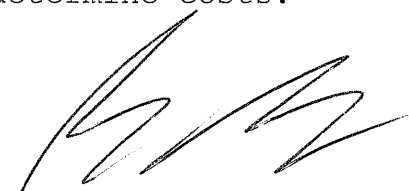
OFFER OF JUDGMENT

DON PABLO, INC., PABLO CASTRO, and :
XIOMARA CASTRO, :

Defendants. :
-----X

PURSUANT TO RULE 68 of the Federal Rules of Civil Procedure, Defendants hereby offer to allow judgment to be taken against them in this action, in the amount of \$15,000, including counsel fees and costs accrued to date. This offer of judgment is made for the purposes specified in Rule 68, and is not to be construed either as an admission that the defendant is liable in this action, or that the plaintiff has suffered any damage. This offer of judgment shall not be filed with the Court unless (a) accepted, or (b) in a proceeding to determine costs.

Dated: September 22, 2020
Mineola, NY



Raymond Nardo, Esq.
Counsel for Defendants
129 Third Street
Mineola, NY 11501
Tel: (516) 248-2121
Fax: (516) 742-7675

CERTIFICATE OF SERVICE

I, RAYMOND NARDO certify that on September 22, 2020, I served the enclosed:

OFFER OF JUDGMENT

by electronic mail addressed to counsel for plaintiff located at:

Lee Litigation Group, PLLC
148 W. 24th Street, 8th Floor
New York, NY 10011

Tenzin Tashi tenzin@leelitigation.com
CK Lee cklee@leelitigation.com

